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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91156321
Party	Plaintiff The Chamber of Commerce of the United States of America The Chamber of Commerce of the United States of America ,
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Submission	Stipulated/Consent Motion to Extend
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Date	04/16/2007
Attachments	Motion to Reset Trial Dates (USHCOC).pdf (4 pages)(26191 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

THE CHAMBER OF COMMERCE OF
THE UNITED STATES OF AMERICA

Opposer,

v.

UNITED STATES HISPANIC CHAMBER
OF COMMERCE FOUNDATION,

Applicant.

Opposition No.: 91/156,321

Serial No.: 78/081,731

MOTION ON CONSENT TO RESET TRIAL DATES

Pursuant to TBMP Section 509 and Trademark Rule 2.121, Opposer, The Chamber of Commerce of the United States of America, requests that the trial dates for this proceeding be reset in accordance with the schedule below. Opposer is making this request to accommodate the scheduling conflicts of counsel for Applicant, United States Hispanic Chamber of Commerce Foundation, which has consented to this request.

Testimony in the present case opened on March 20th, 2007. On April 2nd, Opposer served on Applicant its *Notices of Taking Testimonial Depositions*, setting testimony in this case for April 18th – 20th. Shortly thereafter, Applicant asserted that it would be unable to attend the scheduled testimony, and that it also could not attend any depositions in May because of a conflicting trial schedule. Applicant thus requested that Opposer reschedule its testimony depositions for some time beginning the first week of June. To accommodate that request, Opposer has agreed to reschedule its testimony dates, which will now run from June 8th – 28th.

Opposer thus submits that it has shown good cause for extending the testimony period, and requests on consent that its testimony period be extended up through and including **Friday, June 29th**. Specifically, the parties consent to the following schedule:

30-day testimony period for plaintiff in the opposition to close:	6/29/2007
30-day testimony period for defendant in the Opposition and as plaintiff in the counterclaim to close:	8/29/2007
30-day testimony period for defendant in the counterclaim and its rebuttal testimony as plaintiff in the opposition to close:	10/29/2007
15-day rebuttal testimony period for plaintiff in the counterclaim to close:	12/15/2007
Briefs shall be due as follows: [See Trademark rule 2.128(a)(2)].	
Brief for plaintiff in the opposition shall be due:	2/15/2008
Brief for defendant in the opposition and as plaintiff in the counterclaim shall be due:	3/17/2008
Brief for defendant in the counterclaim and its Reply brief (if any) as plaintiff in the opposition shall be due:	4/17/2008
Reply brief (if any) for plaintiff in the counterclaim shall be due:	5/2/2008

Opposer submits that the proposed schedule modifications are necessary to permit the orderly presentation of evidence in this case and are being made to accommodate the parties' scheduling concerns, and not for the purpose of delaying these proceedings.

However, should the Board not agree to the above proposed schedule, Opposer requests in

the alternative that the Board grant at least a thirty (30) day extension of time to permit Opposer to reschedule the trial depositions previously noticed.

Respectfully submitted,

Date: April 16, 2006

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CERTIFICATE OF SERVICE

I hereby certify that the required number of copies of the foregoing *Motion On Consent To Reset Trial Dates* was served on the parties or counsel on the date and as indicated below:

***By First-Class Mail (Postage Prepaid)
and Facsimile: (310) 312 – 4224***

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Date: April 16, 2007

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